



3	Corporate representative of HMC/CAH Consolidated, Inc.	c/o Ryan Ray Norman Wohlegmuth Chandler Jeter Barnett & Ray 401 S. Boston Ave., Suite 2900 Tulsa, OK 74103	Facts and circumstances related to the transaction between SMHA and CAH-9 and giving rise to Plaintiff's claims
4	Corporate representative of Rural Community Hospitals of America, LLC	c/o Ryan Ray Norman Wohlegmuth Chandler Jeter Barnett & Ray 401 S. Boston Ave., Suite 2900 Tulsa, OK 74103	Facts and circumstances related to the transaction between SMHA and CAH-9 and giving rise to Plaintiff's claims
5	Corporate representative of Novitas Solutions	Subpoena to be issued	Procedures followed by Novitas to recoup a Medicare overpayment; overpayments related to cost reports made by Novitas to CAH-9; refunds of underpayments made by Novitas to CAH-9; amounts withheld by Novitas from SMHA or CAH-9
6	Corporate representative of the Oklahoma Health Care Authority-Women, Infants, & Children Program Services Division	Subpoena to be issued	Amounts due and paid related to SMHA pursuant to the WIC Program during the relevant time period
7	All persons necessary to authenticate exhibits		n/a
8	All additional witnesses identified through discovery		n/a

	or otherwise		
9	All witnesses listed by Defendants to whom Plaintiff does not object		n/a
10	All witnesses needed for rebuttal		n/a
11	Expert witnesses		n/a

### **EXHIBIT LIST**

1. Asset Purchase Agreement between Seiling Municipal Hospital Authority and CAH Acquisition Company 9, LLC dated October 1, 2014;
2. Agreements between RTG Medical and CAH Acquisition Company 9, LLC dated November 8, 2013;
3. Ronald Kaufman letter to Larry Troxell dated April 20, 2015;
4. Trent Skaggs letter to Mickey Louthan dated June 8, 2016;
5. Lysbeth George letter to Trent Skaggs dated June 14, 2015;
6. 2009-2014 Cost Reports related to the provider number assigned to SMHA;
7. Medicare and/or Medicaid Overpayment and Intent to Refer Letters from Novitas Solutions, Inc. of various dates during the relevant time period related to the provider number assigned to SMHA;
8. Medicare and/or Medicaid Tentative Settlement Letters from Novitas Solutions, Inc. of various dates during the relevant time period related to the provider number assigned to SMHA;
9. Medicare and/or Medicaid Notice of Program Reimbursement Letters from Novitas Solutions, Inc. of various dates during the relevant time period related to the provider number assigned to SMHA;
10. Medicaid and/or Medicaid Provider Remittances of various dates during the relevant time period related to the provider number assigned to SMHA;
11. Humana Automated Remittance Advices of various dates during the relevant time period related to the provider number assigned to SMHA;
12. Payment Advices of various dates during the relevant time period related to the provider number assigned to SMHA;

13. Email correspondence between Lori Creek, director of finance for RCHA and Tonja Robinson regarding bone density scanner;
14. Correspondence and documents related to the lease agreement between CAH and General Electric Capital Corporation;
15. Account records for Seiling State Bank, Acct # 2004615;
16. All discovery responses;
17. Documents relied upon by any expert witness(es);
18. Expert Report(s), if any;
19. Other documents identified through investigation or during depositions or discovery and not otherwise objected to by Plaintiffs;
20. All documents produced by Defendants not otherwise objected to by SMHA;
21. All documents produced by any third-parties in response to subpoenas;
22. Deposition transcripts and exhibits thereto; and
23. Demonstrative Exhibits not objected to by SMHA.

Respectfully submitted,

s/Lysbeth L. George

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2017, I electronically transmitted the attached document to the Court Clerk using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to all ECF registrants:

Ryan A. Ray  
NORMAN WOHLGEMUTH CHANDLER  
JETER BARNETT, & RAY, P.C.  
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ATTORNEYS FOR DEFENDANTS

s/ Lysbeth George  
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Lysbeth George